

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria, Virginia**

MICROHITS, INC.,)	
<i>et al.</i> ,)	
)	
)	
Plaintiffs,)	
)	12cv307 (LO)
)	
v.)	
)	
MEGAUPLOAD, LTD.,)	
<i>et al.</i> ,)	
)	
Defendants.)	
)	

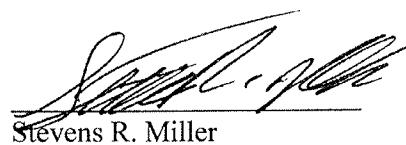
DECLARATION OF STEVENS R. MILLER

I, Stevens R. Miller, do hereby state as follows:

1. I am the owner and operator of Data Forensics Labs of Northern Virginia, Inc. ("Data Forensics Labs"), based in Broadlands, Virginia.
2. I have operated Data Forensics Labs for 12 years.
3. I have testified as an expert at deposition or at trial concerning data forensics matters in a total of more than a dozen cases, both in federal and state court.
4. A "server log" is typically, among other things, a detailed record of transactions between a data storage repository and one or more remote entities retrieving data from, or adding data to, that repository. Such records usually include identifying information pertaining to the entity, times and dates of access, descriptions of what data was accessed, durations of access, amounts of data accessed, as well as commercial and security information that can include usernames, passwords, purchase or sale amounts (including amounts of money transacted and amounts of data sold or purchased), software used to access the repository, protocol information describing the method used to access the repository, and other information frequently of substantial evidentiary value in the context of a litigation.

5. The cost of maintaining a server log is minimal. These logs can and should be retained by hosting companies in the ordinary course of their business. In my experience, the cost to maintain server logs is akin to the cost of retaining Microsoft Word documents on a conventional corporate document storage network, *i.e.*, pennies per day (if that) per server log stored.

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge and belief.



Stevens R. Miller

April 12, 2012